

CALIFORNIA CENTRAL VALLEY FLOOD CONTROL ASSOCIATION

Organized in 1926

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June 26, 1998

Lester A. Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Snow:

RE: Comments on Draft Programmatic EIR/EIS.

The California Central Valley Flood Control Association is comprised of approximately 70 levee, reclamation, drainage and flood control districts, private landowners, counties and one city between Red Bluff and Manteca. The Association was organized in 1926 by those responsible for the maintenance of levees, primarily in the Sacramento Valley and Delta. Its goal is to further flood protection and protect the integrity of the levee system.

In our interest in supporting a successful CALFED planning program we are providing the following comments on the draft Programmatic EIR/EIS.

The past two years have greatly increased the awareness of the un-met needs of the current flood control protection system. While we acknowledge the CALFED program was not originally intended to provide flood control outside of the Delta, we are concerned with the potential for conflict with the existing flood control system. We believe CALFED must integrate flood control needs into the planning process.

In the Delta the levee integrity program which is a core effort of CALFED must provide significant additional protection for islands if it is adequately funded and not bogged down with environmental baggage. Funding for replacement and relocation of other infrastructure such as roads and utilities must be included in levee integrity programs. Substantial ongoing and reliable funding is needed to support and expand the existing Delta Levee Subvention Program.

We noted in the Program Description Section at page 2-10 several statements which give us concern. In the first paragraph of the left hand column the following statement is made: "The ERP is not designed as mitigation for projects that would improve water supply reliability or bolster the integrity of Delta levees." We believe this means the ecosystem program of CALFED will conflict with mitigation required for Delta levee repair and maintenance. It will be very difficult to gain support among Delta reclamation districts for your proposed ecosystem and habitat program if and when they are faced with repair or reconstruction they are required to go through an extensive permitting process and bear heavy financial costs for mitigation. It would seem logical to provide for the implementation of the core project elements including permitting and mitigation in the process of developing the ERP. To proceed as you have stated would require the Delta islands to take a double hit in providing acreage for habitat and create even greater redirected impact of land use changes on the area.

On the same page in the lower right hand quarter is a listing of potential concerns which could result from the habitat restoration program. "Restoration of riparian habitats adjacent to levees may increase the difficulty of maintaining safe and stable levees and may increase risk of levee catastrophic failure.sediment loads may also increase maintenance costs for flood bypass systems. Floodway conversions to habitat may increase maintenance costs or impair floodway capacities; there may also be impacts to agricultural acreage." We agree with these statements and are concerned with the actions proposed which create such concerns. The EIR/EIS should address how these impacts will be avoided.

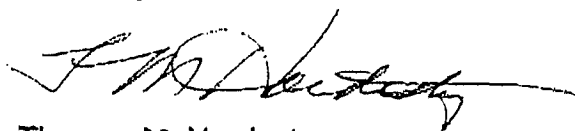
We are also concerned with the potential adverse impact on local agencies who have responsibility for maintenance of the flood control facilities and are wholly reliant on local assessments for their funding. The CALFED effort of acquiring large tracts for environmental projects or converting existing land uses could have a devastating impact on the ability of local agencies to fund their ongoing maintenance needs and thereby jeopardize protection from flooding not only for their immediate protected area but for adjoining lands as well. Careful analysis and guaranteed future sources of adequate revenue for local entities should be included in any assurances provided.

Upstream from the Delta it appears the setback of levees are designed only to provide more opportunities for establishment of habitat and not to improve flood control efforts. We believe it is essential that the CALFED planning program be compatible with the results of the current Sacramento-San Joaquin Comprehensive Study being conducted by the U. S. Army Corps of Engineers and State Reclamation Board.

We note the interest in off stream storage in your report and are concerned for the need to provide on stream storage. Although off stream storage provides some flood control benefit it is limited relative to on stream storage projects. We are disappointed that CALFED has not included in its long term planning a proposal to complete Auburn Dam which could supply both water and flood control benefits. With California's identified future needs it is imperative that a substantial amount of additional water and flood control will be needed. In all previous statewide water development efforts new on stream storage has been built and provides for the benefits of a project to be made available to a broader sector of our state. The primary benefit received by the Sacramento Valley and Delta in the development of the CVP and the SWP was retention of flood flows in on stream reservoirs.

We thank you for the opportunity to provide these comments and look forward to your response. Please contact us if there are any questions or if any clarification of our comments is needed.

Sincerely,



Thomas M. Hardesty
President

cc: Directors
Senator Johannessen